

**Comments on:**

**Applicant(s): CenturyLink Communications, LLC d/b/a CenturyLink QCC**

**WC Docket No. 16-383, Comp. Pol. File No. 1362**

**Re: Section 214 Discontinuance Application**

Received & Inspected  
NOV 30 2016  
FCC Mail Room

Submitted November 19, 2016, from:

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I urge the Commission to not approve this requested discontinuance authority application, which threatens to decommission existing telephone landlines in many places.

Landlines provide an important resilient communication network when electricity and cell service goes out (which seems to be more likely with the growing "smart grid"). Moreover, many millions of people (including our family) rely solely on landlines for their communication needs, including internet service. Eliminating this in any location would be a violation of human rights and essential needs – a big step backward.

In general, call quality is far superior on a copper or fiber-optic landline. Many consumers want this. So is it really progress to make customers suffer through static and dropped calls and irregular service? The most reliable are fiber-optic lines – this is what we should be encouraging utilities to install.

I have a friend in Wisconsin, where rural telephone coops and companies are steadily replacing copper wires with fiber optics lines that provide telephone (including internet telephone or VOIP), high speed internet, and HD TV over a single "wire." These are good for business and residence service alike, and much better quality and more healthy than satellite dish or cell tower/antenna wireless services.

Landline phone lines are more secure, operate in emergencies with station batteries, provide security and location with 911 service, and provide a secondary source for DSL internet service. Under this proposal many would likely lose the flexibility and service they have enjoyed for many years.

I understand there is no way of locating a 911 call that is IP based. Not having landline 911 calls available for emergencies, especially during a power outage, is a threat to human health and safety. In addition, many businesses rely on landlines for alarm monitoring and to run credit card transactions. Alarm monitoring, including court ordered house arrest, is not possible on IP phone systems. Likewise, elderly or medical patients cannot be properly monitored for cardiac, newborn, or transplant care. Please do not allow this.

Particularly with regard to rural locations (such as where I live), satellite internet doesn't support VOIP, the cost is high, the limits on data per month are restrictive, and rain, fog, trees, snow, etc. make it less reliable. It also is not an alternative to a 911-secure, landline equivalent phone service over internet – let alone an actual physical landline.

In addition, corded landlines are far safer than wireless mobile phones, which emit microwave/radiowave electromagnetic radiation associated with brain tumors, cell and genetic damage, blood diseases, and many other health problems (as testified by tens of thousands of scientific studies; see [www.powerwatch.org.uk](http://www.powerwatch.org.uk)). Persons afflicted with the EHS (Electromagnetic Hypersensitivity) disability, like several whom I know and reportedly over 12 million Americans nationwide, can ONLY use landlines, since the low-frequency radiation in cell phones, wireless routers, etc. makes them ill.

Rather than allowing Section 214 discontinuances for the sake of private corporation profits and larger CEO bonuses, we should be encouraging the kind of steps by forward-thinking, service-oriented utilities like those described above in Wisconsin. Financially, abandoning landlines can appear attractive to utility firms, who actually intend to become primarily software companies with little overhead and to farm out our IP to cheaper labor in Asia or elsewhere, taking jobs away from American workers. Furthermore, with remote or foreign switching of data a problem in Georgia could mean a telecom blackout for Southern California. T-Mobile was fined for just such an instance last year when half the country lost 911 on their service.

CenturyLink apparently wants to start to abandon its existing legal obligation to help maintain landlines (including the central switching offices) at the expense of small businesses, rural customers, and public safety. Instead, internet access at some minimal service level to support emergency services and small businesses and residences needs to be codified as essential and regulated.

Finally, given the potential scope of the impact of this proposal on millions of Americans, I also request an extension of time to file comments along with additional, broader notification about this application.